

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TAMSIN WOLF

Plaintiff,

vs.

TIME WARNER INC.

Defendant.

Index No. 09-CV-06549-RJS

**DECLARATION OF KIMBERLY M. BULKLEY IN SUPPORT OF DEFENDANT'S
MOTION FOR SUMMARY JUDGMENT**

I, Kimberly M. Bulkley, declare, under penalty of perjury, as follows:

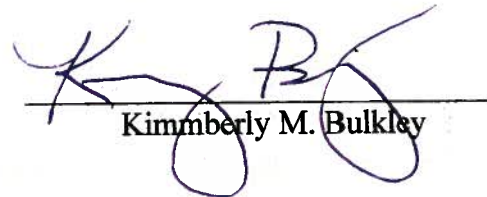
1. I am Assistant General Counsel at Time Warner Inc. ("Time Warner").
2. It is my practice to create talking points for managerial meetings at which I am expected to speak on sensitive topics, including discussions regarding performance. This has been my practice throughout my career at Time Warner.
3. It is also my practice to use the talking points as a script for my statements at the subject meeting, and I cover all of the written points in substance, if not verbatim. If I do not cover a written point at a meeting, it is my practice to make a note of that -- or of any other substantive departure from my prepared remarks -- on the face of the document.
(See, e.g., HC01605.)
4. It is also my practice to take handwritten notes at meetings I attend. The notes reflect my contemporaneous observation of statements made at the meeting. It is my regular practice to save such notes.
5. I have examined documents bearing the following Bates numbers which contain my talking points for meetings I have attended at Time Warner: TimeWarnerEL00969-70 (2/12/07 meeting), TimeWarnerHC01353 (3/19/07 meeting), TimeWarnerHC01685-86

(4/30/07 meeting), TimeWarnerHC01789-90 (7/5/07 meeting), TimeWarnerHC01713-15 (7/19/07 meeting), and TimeWarnerHC00630-32 (8/6/07 meeting). These talking points fully and accurately reflect the substance of my comments in those meetings.

6. I have examined documents bearing the following Bates numbers which contain my handwritten notes: TimeWarnerHC01605 (notes from 2/12/07 meeting), TimeWarnerHC01539 (notes from 2/26/07 meeting), TimeWarnerHC01542 (notes from 3/5/07 meeting), TimeWarnerHC01543 (notes from 2/07 or 3/07 meeting), TimeWarnerHC01544 (notes from 3/07 meeting), TimeWarnerHC01407-08 (notes from 4/24/07 meetings), TimeWarnerHC01409 (4/25/07 meeting), TimeWarnerHC01687 (notes from 4/30/07 meeting), TimeWarnerHC01787 (notes from 6/28/07 meeting), TimeWarnerHC01760 (notes from 7/12/07 meeting), TimeWarnerHC01640 (notes from 7/19/07 meeting), TimeWarnerHC01654-55 (notes from 7/23/07 meeting), and TimeWarnerHC01641 (notes from 7/24/07 meeting). These notes, which were taken contemporaneously with the meetings they describe, accurately reflect the substance of those meetings and statements made during those meetings.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 5, 2011.


Kimberly M. Bulkley